FINDINGS OF CONFORMANCE
MULTIPLE SPECIES CONSERVATION PROGRAM
For Walls Tentative Parcel Map
TPM 21008, ER 06-14-024
APN (s) 510-020-12, 510-031-06, 510-040-17

August 21, 2009

I. Introduction

The project is a minor subdivision of 72.2 acres into four residential parcels ranging in size from 4.0 to 9.3 acres and a remainder parcel of 45.1 acres. The project site is located along Harbison Canyon Road in the Crest-Dehesa Community Planning Area within unincorporated San Diego County. The project site is surrounded by residential development to the west and southwest and vacant land to the north and east. The project site would be served by on-site septic systems and imported water from the Padre Dam Municipal Water District. The project site is within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program (MSCP).

The project site currently contains a residence, horse corral and accessory structures which are to remain on parcels 1 and 2. The project site contains steeply sloping lands ranging from 680 feet to 1,160 feet in elevation. The western portion of the site contains a south trending portion of Harbison Canyon Creek. The portions of Harbison Canyon Creek occurring onsite will be protected by a biological open space easement as well as a 100-foot limited building zone.

Habitats onsite consist of southern coast live oak riparian forest, sycamore alluvial woodland, coast live oak woodland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, rock outcroppings, disturbed habitat and urban/ developed lands (Table 1). Two County-sensitive plants and five County-sensitive wildlife species were observed on site: San Diego Sunflower (*Viguiera laciniata*), Delicate Clarkia (*Clarkia delicate*), Rufous-Crowned Sparrow (*Aimophila ruficeps canescens*), Yellow Warbler (*Dendroica petechia*), Orange-Throated Whiptail (*Cnemidophorus hyperythrus*), Yellow-Breasted Chat (*Icteria virens*) and Coronado Skink (*Eumeces skiltonianus interpartietalis*). Protocol surveys were performed in 2004 for Arroyo Toad and in 2005 for Quino checkerspot butterfly, both with negative results. A portion of the site is within a Pre-Approved Mitigation Area in the Metro-Lakeside-Jamul segment of the County Subarea Plan and therefore the entire site is considered a Biological Resource Core Area (BRCA). The project site is located along the eastern edge of the Dehesa to El Capitan Reservoir linkage and may serve as a local wildlife movement corridor.

The subdivision would impact 0.01 acres of unvegetated channel, 0.02 acres of sycamore alluvial woodland, 0.58 acres of coast live oak woodland, 0.03 acres of Diegan coastal sage scrub, 3.95 acres of southern mixed chaparral and 4.81 acres of

non-native grassland through clearing, grading and construction of three single family residences, septic fields, driveways, and associated fire-clearing (Table 1).

Two biological open space easements will be dedicated over 17.08 acres of the project site. The biological open space easements will be bordered by 100-foot wide limited building zone easements to prevent future fire-clearing within the open space easements. Mitigation will consist of both onsite preservation and offsite habitat purchase, as detailed in the Mitigation Negative Declaration (MND).

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation	Onsite Open Space***	Offsite Mitigation
Unvegetated Channel	I	**	0.01	3:1	0.03	--	0.03
Southern Coast Live Oak Riparian Forest	I	5.75	0.00	--	--	0.50	--
Sycamore Alluvial Woodland	I	0.93	0.02	2:1	0.04	0.00	--
Coast Live Oak Woodland	I	1.15	0.58	2:1	1.16	0.64	0.11
Diegan Coastal Sage Scrub	II	0.64	0.03	1.5:1	0.05	0.00	0.05
Southern Mixed Chaparral	III	42.49	3.95	1:1	3.95	9.00	--
Non-native Grassland	III	14.15	4.81	0.5:1	2.41	6.79	--
Disturbed Habitat	IV	1.43	1.23	--	--	0.00	--
Ornamental	IV	2.14	1.50	--	--	0.00	--
Rock Outcrop	IV	0.41	0.00	--	--	0.00	--
Developed Land	IV	3.11	1.90	--	--	0.15	--
Total:	--	72.18	14.03	--	7.64	17.08	0.19

** The area of unvegetated channel was measured only for the purpose of determining direct impacts to this habitat. The remainder of unvegetated channel was included in the overstory sycamore alluvial woodland.
***Tier I habitats will be mitigated for through the preservation of other Tier I habitats onsite as well as the purchase of 0.11 acres of offsite Tier I habitat.

The findings contained within this document are based on County records, staff field site visits and the Biological Resources Report (Nordby Biological Consultants, June 1, 2009). The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Game and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall

be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.

A portion of the project site is within a Pre-Approved Mitigation Area in the Metro-Lakeside-Jamul segment of the County Subarea Plan and therefore, the entire site is considered a Biological Resource Core Area (BRCA).

B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.

As a Biological Resource Core Area, the open space resulting from this project is considered part of the regional MSCP preserve system. As such, all of the requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement and the Final MSCP Plan apply to this open space.

The project will also purchase offsite habitat to satisfy mitigation requirements. The offsite purchase will be within a County-approved conservation/mitigation bank or at a site that meets the definition of a BRCA.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area.

1. Project development shall be sited in areas to minimize impact to habitat.

The proposed project will impact 14.03 acres or 19% of the total project site. Impacts have been sited in areas which will minimize impacts to high value habitat. Two dedicated biological open space easements will be dedicated over 17.08 acres or 24% of the total project site. The remaining 41.07 acres

contained on the proposed remainder parcel are counted as impact neutral and contain very steep slopes. This impact neutral area would be subject to further discretionary review prior to the approval of any building and/or grading permits issued for the remainder parcel. Therefore, 81% of the project site will remain in its natural state thereby minimizing habitat impacts due to this project.

2. **Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.**

   The proposed pads have been situated near existing residential development and in the areas which will have the least habitat impacts. The design of the proposed project will allow for the avoidance and preservation of a large block of high value habitat which is contiguous with vacant offsite lands.

3. **Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.**

   The project will develop the flatter and least sloping areas of the site. By placing the development in the flatter area of the site, high value habitat within the steep sloping lands onsite will be avoided and preserved. Therefore, slope encroachment is not necessary to avoid habitat impacts.

4. **The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations.**

   Given the alignment of lots along most of the proposed road, reducing road standards would not assist in protecting more habitat that might otherwise be preserved. Minimal road widths are already being proposed. To decrease these widths below their current proposals (and below County public road standards), would affect public safety. Since the gains for habitat protection would be very minimal at best, reducing road standards is not warranted.

5. **Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).**

   The project site is located within a Pre-Approved Mitigation Area. Compliance with design criteria is outlined in sections III.B and III.C of this document.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all

projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

1. **Acknowledge the "no net loss" of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.**

   Harbison Canyon Creek, which runs along the western border of the project site, qualifies as a wetland under County, State, and Federal regulations. The majority of wetlands on the site will be protected within a dedicated biological open space easement. The project proposes a single crossing of Harbison Canyon Creek to access the site as there is no other feasible alternative to access the site. There is an existing, unimproved road which currently crosses Harbison Canyon Creek which will be utilized to minimize wetland impacts by the proposed project. Impacts to the unvegetated channel as a result of the wetland crossing will be mitigated for through the purchase of offsite wetland habitat which shall include a minimum 1:1 creation component. The project will also be conditioned to obtain a Clean Water Act, Section 401/404 permit issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers as well as a Streambed Alteration Agreement issued by the California Department of Fish and Game. Therefore, the no-net-loss standard set by the State, Federal and County regulations will be met.

2. **Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.**

   The project will preserve 17.08 acres of onsite biological open space including the following diverse habitats: southern coast live oak riparian forest, coast live oak woodland, southern mixed chaparral and non-native grassland. In addition, the open space will include representative locations of San Diego Viguiera (*Viguiera laciniata*), a County sensitive plant. This preservation will maximize habitat structural diversity by including three sensitive habitats, a jurisdictional wetland, a sensitive plant species, and habitat for three sensitive wildlife species observed on site.

3. **Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.**

   The project site contains only small patches of low value Diegan coastal sage scrub habitat but does contain habitat types that are ranked as "very high" and "high" biological value by the MSCP habitat evaluation model. Although the small patches of Diegan coastal sage scrub onsite are not of high value for conservation, the project proposes to preserve habitat within Harbison Canyon

Creek which is ranked as "very high" by the MSCP habitat evaluation model as well as a large block of habitat in the southern portion of the site ranked as "high" by the MSCP habitat evaluation model.

4. **Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise.**

   The onsite open space in the southern portion of the site will connect to undeveloped land to the east and southeast. There are no edge effects anticipated in these directions. To reduce edge effects from the proposed additional residential lots created by this project, a 100-foot wide Limited Building Zone Easement and temporary fencing during grading will be required adjacent to the open space. The Limited Building Zone Easement will prohibit the construction of any habitable structures within 100 feet of the open space easement, therefore precluding the need for future fire-clearing in the open space. In addition, the northern portion of the remainder parcel counted as impact neutral will remain in its natural state adjacent to undeveloped lands. Subsequent discretionary review would be required prior to any impacts of this area. The project will comply with the San Diego County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) and the Stormwater Management Plan (Chang Consultants, March 17, 2009), which will prevent adverse impacts from runoff to the open space.

5. **Provide incentives for development in the least sensitive habitat areas.**

   The project will conserve the most sensitive habitat areas onsite; Harbison Canyon Creek which is part of the Dehesa to El Capitan Reservoir linkage as well as a large block of high value habitat in the southern portion of the site. The majority of the habitat impacts onsite will occur to southern mixed chaparral and non-native grassland which are the least sensitive habitats onsite.

6. **Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.**

   No narrow endemic species have been identified on the project site. The following County sensitive wildlife species were observed on site: Rufous-Crowned Sparrow (*Aimophila ruficeps canescens*), Yellow Warbler (*Dendroica petechia*), Orange-Throated Whiptail (*Cnemidophorus hyperythrus*), Yellow-Breasted Chat (*Icteria virens*) and Coronado Skink (*Eumeces skiltonianus interpartietalis*). Impacts to these species will be minimized by preservation of habitat on site that will continue to support these species. Two sensitive plant

species, San Diego Viguiera (*Viguiera laciniata),* a Group D species, and Delicate Clarkia (*Clarkia delicate*), a Group A species was identified on site. Impacts to Delicate Clarkia have been completely avoided through project design. Impacts to San Diego Viguiera will be adequately conserved if appropriate habitat-based mitigation is applied. Habitat mitigation will be a condition of project approval. No other sensitive species have been identified on the project site.

7. Preserve the biological integrity of linkages between BRCAs.

The site is part of the Dehesa to El Capitan Reservoir linkage. In the project area, the linkage is approximately 4,400 feet wide. The project encompasses approximately 550 feet at the eastern end of the linkage. The proposed development will impact less than 200 feet of the width of the linkage for a distance of approximately 500 feet. The linkage width after the project will remain at least 4,000 feet wide. A dedicated Limited Building Zone Easement, permanent fencing, and permanent signs are required, to reduce edge effects from the proposed development into the linkage. The proposed open space easement as well as the limited building zone easement over Harbison Canyon Creek will adequately preserve the integrity of the Dehesa to El Capitan Reservoir linkage.

8. Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).

The project site does not support any covered species and would therefore not require species-specific management measures. Impacts to habitat will be mitigated at the ratios required by the BMO to ensure long-term viability of any covered species discussed in Table 3-5.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.

The project site is part of the Dehesa to El Capitan Reservoir linkage. The proposed development will impact less than 200 feet of the width of the linkage for a distance of approximately 500 feet. The linkage width after the project will remain at least 4,000 feet wide. The proposed open space easement as well as the limited building zone easement over Harbison Canyon Creek will adequately maintain the Dehesa to El Capitan Reservoir linkage.

2. **Existing movement corridors within linkages will be identified and maintained.**

   Harbison Canyon Creek likely serves as a local wildlife movement corridor. The existing portion of the Dehesa to El Capitan Reservoir linkage on the project site which also acts as a local wildlife movement corridor will be maintained through the dedication of a biological open space easement and limited building zone easement.

3. **Corridors with good vegetative and/or topographic cover will be protected.**

   The open space easement proposed over Harbison Canyon Creek will preserve coast live oak woodland, southern coast live oak riparian forest and sycamore alluvial woodland. Therefore, the local wildlife movement corridor onsite will be protected and will provide good vegetative cover for a variety of wildlife species.

4. **Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.**

   The preservation of open space on this property will contribute to the existing regional linkage, which will continue to accommodate travel for a wide range of resident wildlife populations.

5. **The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.**

   The site is part of the Dehesa to El Capitan Reservoir linkage and has the potential to be used by several wildlife species. After development, the linkage will be over 4,000 feet wide along the project site. Harbison Canyon Creek varies topographically from the proposed development onsite. In addition, a 100-foot limited building zone easement will be dedicated and permanent fencing and signage will be used to prevent edge effects from adjacent development.

6. **If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

The linkage will maintain a width of greater than 4,000 feet through the length of the project site, and the dedicated open space required for this project will contribute to this width. Topographically, the proposed development will occur above Harbison Canyon Creek. The site has the potential to be used by several wildlife species. Site development will narrow the linkage width through a portion of the site. However, the remaining width and preserved habitat will continue to provide hiding places and movement opportunities for a variety of wildlife species.

7. **Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.**

   The proposed development will occur up slope from Harbison Canyon Creek. The steepness of the canyon containing Harbison Canyon Creek provides topographic separation between the linkage and proposed development. In addition, the vegetated slopes along the creek will maintain visual continuity for animals moving through the linkage.

8. **Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.**

   To reduce human disturbance, a 100-foot wide limited building zone easement will be dedicated adjacent to the open space. This limited building zone easement will prohibit the construction of any habitable structures within 100 feet of the open space easement, reducing the noise and lighting levels within the open space. In addition, fencing and signage will be required along the open space boundaries where proposed development occurs within 300 feet of the corridor to prevent inadvertent entrance into or disturbance of the open space by humans.

9. **Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.**

   The proposed access road for this project passes through Harbison Canyon Creek but will utilize an Arizona Crossing where past disturbance has occurred from an existing dirt access road. Although the road will be improved to County public road standards, it is not expected that it will cause a significant disturbance through the existing corridor. Alternative options for the crossing would have more environmental impacts than the proposed crossing. It is not

expected that wildlife will frequent this portion of the wetland due to the existing residence near the proposed crossing.

10. **Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.**

    The project includes a road that passes through Harbison Canyon Creek. The Arizona crossing will be placed where past disturbance has occurred from a previous crossing. No bridges are necessary because the project will maintain the existing topography of the drainage to the maximum extent possible, and wildlife may continue to move through the drainage.

11. **If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.**

    A continuous linkage exists at the site, and will be preserved through the dedication of open space as a condition of the project.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

1. **The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.**

    Harbison Canyon Creek, which runs along the western border of the project site, qualifies as a wetland under County, State, and Federal regulations. The majority of wetlands on the site will be protected within a dedicated biological open space easement. The project proposes a single crossing of Harbison Canyon Creek to access the site as there is no other feasible alternative to access the site. There is an existing, unimproved road which currently crosses Harbison Canyon Creek which will be utilized to minimize wetland impacts by the proposed project. Impacts to the unvegetated channel as a result of the wetland crossing will be mitigated for through the purchase of offsite wetland habitat which shall include a minimum 1:1 creation component. The project will also be conditioned to obtain a Clean Water Act, Section 401/404 permit issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers as well as a Streambed Alteration

Agreement issued by the California Department of Fish and Game. Therefore, the no-net-loss standard set by the State, Federal and County regulations will be met.

2. **The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.**

   The project will preserve 17.08 acres of onsite biological open space including the following diverse habitats: southern coast live oak riparian forest, coast live oak woodland, southern mixed chaparral and non-native grassland. In addition, the open space will include representative locations of San Diego Viguiera (*Viguiera laciniata*), a County sensitive plant. This preservation will maximize habitat structural diversity by including three sensitive habitats, a jurisdictional wetland, a sensitive plant species, and habitat for three sensitive wildlife species observed on site.

3. **The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.**

   The project site contains only small patches of low value Diegan coastal sage scrub habitat but does contain habitat types that are ranked as “very high” and “high” biological value by the MSCP habitat evaluation model. Although the small patches of Diegan coastal sage scrub onsite are not of high value for conservation, the project proposes to preserve habitat within Harbison Canyon Creek which is ranked as “very high” by the MSCP habitat evaluation model as well as a large block of habitat in the southern portion of the site ranked as “high” by the MSCP habitat evaluation model.

4. **The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.**

   The onsite open space in the southern portion of the site will connect to undeveloped land to the east and southeast. There are no edge effects anticipated in these directions. To reduce edge effects from the proposed additional residential lots created by this project, a 100-foot wide Limited Building Zone Easement and temporary fencing during grading will be required adjacent to the open space. The Limited Building Zone Easement will prohibit the construction of any habitable structures within 100 feet of the open space easement, therefore precluding the need for future fire-clearing in the open space. In addition, the northern portion of the remainder parcel counted as impact neutral will remain in its natural state adjacent to undeveloped lands. Subsequent discretionary review would be required prior to any impacts of this area. The project will comply with the San Diego County Watershed Protection, Storm Water Management, and Discharge Control

Ordinance (WPO) and the Stormwater Management Plan (Chang Consultants, March 17, 2009), which will prevent adverse impacts from runoff to the open space.

5. **The project provides for the development of the least sensitive habitat areas.**

   The project will conserve the most sensitive habitat areas onsite; Harbison Canyon Creek which is part of the Dehesa to El Capitan Reservoir linkage as well as a large block of high value habitat in the southern portion of the site. The majority of the habitat impacts onsite will occur to southern mixed chaparral and non-native grassland which are the least sensitive habitats onsite.

6. **The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.**

   The project will conserve the following diverse and sensitive habitats: southern coast live oak riparian forest, coast live oak woodland, southern mixed chaparral and no-native grassland. Although no known key regional populations of covered species are present on the project site, the proposed preserved habitat is contiguous with a large amount of off-site habitat. The project will contribute to the preservation of the biological functions of this habitat, which is likely to support covered species.

7. **Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.**

   The project site contains land that functions as a regional wildlife linkage. Project development will narrow the linkage for a length of 500 feet on the project site, but the proposed open space will ensure the maintenance of a linkage width of at least 4,000 feet. The linkage width will continue to support the movement of large mammals and predators. The site is not located near any known golden eagle nests sites or foraging areas.

8. **All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.**

   No narrow endemic species have been identified on the project site. The following County sensitive wildlife were observed on site: Rufous-Crowned Sparrow (*Aimophila ruficeps canescens*), Yellow Warbler (*Dendroica petechia*), Orange-Throated Whiptail (*Cnemidophorus hyperythrus*), Yellow-Breasted Chat (*Icteria virens*) and Coronado Skink (*Eumeces skiltonianus interpartietalis*). Impacts to these species will be minimized by preservation of habitat on site that will continue

to support these species. Two sensitive plant species, San Diego Viguiera (*Viguiera laciniata),* a Group D species, and Delicate Clarkia (*Clarkia delicate*), a Group A species was identified on site. Impacts to Delicate Clarkia have been completely avoided through project design. Impacts to San Diego Viguiera will be adequately conserved if appropriate habitat-based mitigation is applied. Habitat mitigation will be a condition of project approval. No other sensitive species have been identified on the project site.

9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.

The western portion of the project site is designated as a Pre-Approved Mitigation Area. Through the dedication of open space, the project will contribute to permanent preservation of the wildlife linkage extending from Dehesa to El Capitan Reservoir. In addition, the open space easement in the southern portion of the site will protect high value habitat adjacent to vacant lands to the east. The onsite preserves will include a diversity of habitat types as well as measures to reduce edge effects from future residential uses. The projects onsite preservation will contribute to the assembly of a preserve system within the Subarea Plan.

10. All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.

To reduce edge effects from the proposed development created by this project, a 100-foot wide limited building zone easement will be required adjacent to the biological open spaces to prohibit the construction of any habitable structures within 100 feet of these open space easements, therefore precluding the need for future fire-clearing in the open space. In addition, permanent fencing and signage will be required where proposed development is within 300 feet of the open space easement over Harbison Canyon Creek.

11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.

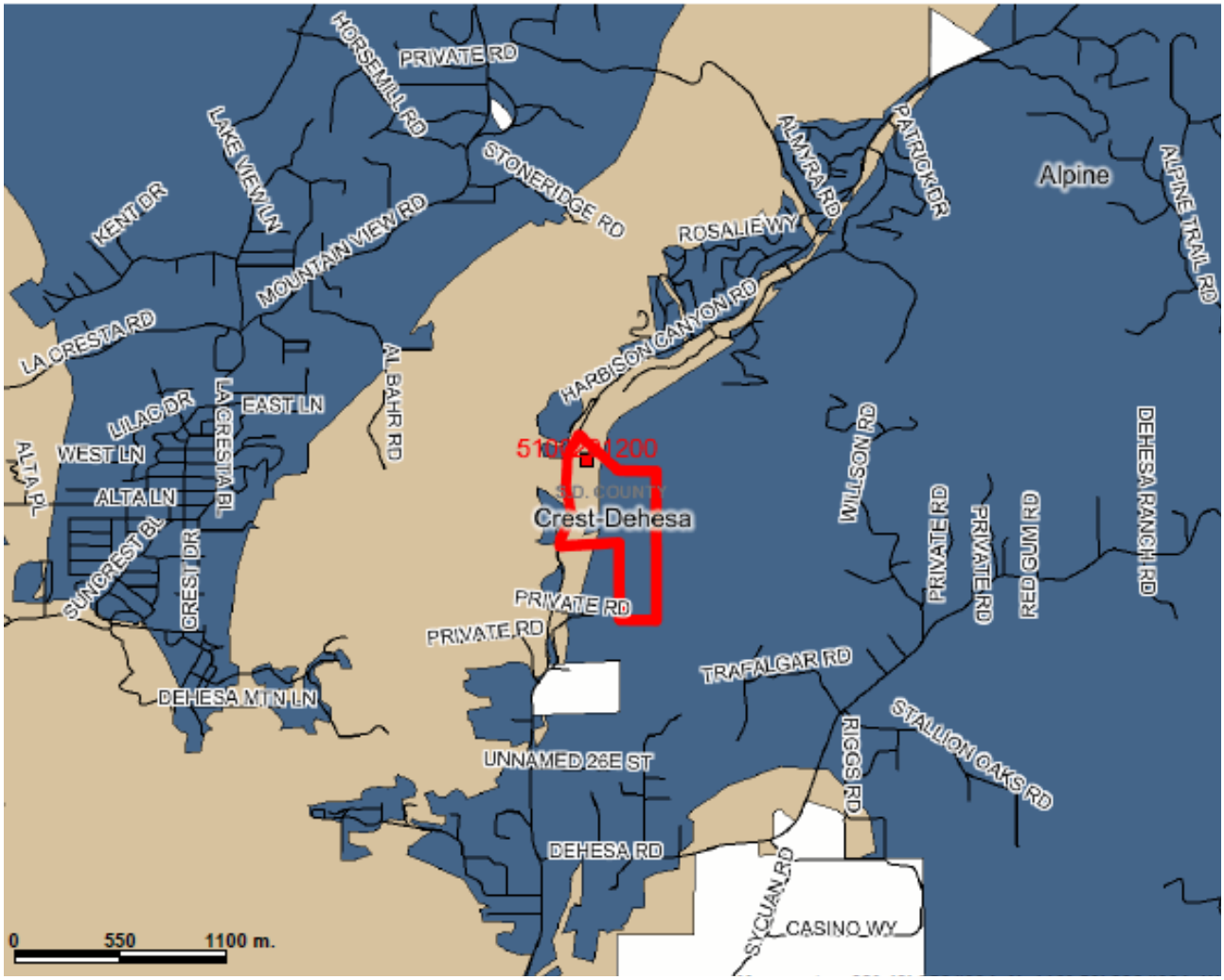
As the site is a BRCA and part of an existing wildlife linkage, project design includes avoidance and preservation of over 80% of the land. Open space easements will be placed over 17.08 acres of the project site while an additional 41.07 acres will be counted as impact neutral as further discretionary review will be required for any further development of this area. The proposed development will be located in the flattest portion of the site and will impact the least sensitive habitats onsite. Specific measures to reduce edge effects from future residential uses will be required adjacent to the open space easements. These include a 100-foot limited building zone easement and permanent fencing and signage along Harbison Canyon Creek where development is proposed within 300 feet. Five County-designated sensitive wildlife species and two County-designated sensitive plants were observed on site. The onsite preservation of 17.08 acres including southern coast live oak riparian forest, coast live oak woodland, southern mixed chaparral

and no-native grassland will provide habitat for these and other species that may colonize the land and/or use the wildlife linkage in the future. Through project design and mitigation conditions, the project has reduced its impacts to the BRCA, sensitive resources and sensitive species.

Ashley Gungle, Department of Planning and Land Use

August 21, 2009

MSCP Designation For
Walls Tentative Parcel Map
TPM 21008, ER 06-14-024



- Parcels with out labels
- Highways
- Freeways
- Streets
- Water Bodies

MSCP_Designations - South

- Hardline Preserve
- Pre-Approved Mitigation Area (PAMA)
- Major Amendment Area
- Minor Amendment Area
- Minor Amendment Area Subject to Special Considerations
- Conserved Subject to Agreement with Wildlife Agencies
- Santa Fe Valley Open Space II
- Santa Fe Valley "D" Designator
- Otay Ranch Areas Where No Take Permits will be Issued
- Take Authorized Area
- Unincorporated Land in Metro-Lakeside-Jamul Segment
- Other